

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

JOHN SABAL,
Plaintiff,

v.

LIN WOOD,
Defendant.

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CIVIL ACTION NO. 4:23-cv-00551-O

DEFENDANT’S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION

Defendant Lin Wood (“Mr. Wood”) files this Motion to Dismiss pursuant to Federal Rule of Civil Procedure 12(b)(2). Because this Court lacks personal jurisdiction over Mr. Wood, this lawsuit filed by John Sabal (“Sabal” or “Plaintiff”) should be dismissed, and in support of dismissal, Mr. Wood would respectfully show the Court the following:

Plaintiff has not, and cannot, meet his heavy burden of establishing that this Court should exercise personal jurisdiction over a Mr. Wood, a South Carolina resident, based on allegedly defamatory statements made on an internet social media site that had no connection to the State of Texas.

This Motion is supported by Mr. Wood’s Brief in Support of Motion to Dismiss Complaint for Lack of Personal Jurisdiction, filed concurrently herewith.

CONCLUSION AND PRAYER

Therefore, because Plaintiff has failed to establish a prima facie basis for personal jurisdiction over Mr. Wood in this case, Mr. Wood prays the Court would dismiss Plaintiff’s Complaint pursuant to Fed. R. Civ. P. 12(b)(2). Mr. Wood further prays for such other and further relief to which he may be justly entitled at law or in equity.

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF SERVICE

This is to certify that on this 4th of August 2023 a true and correct copy of the foregoing document was served by E-Service on the following counsel of record, in accordance with the Federal Rules of Civil Procedure:

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